

Holland & Knight

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***Via Email:* MDD_JMCchambers@mdd.uscourts.gov & ECF**

The Honorable J. Mark Coulson
United States Magistrate Judge
U.S. District Court for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

Re: *Addi, et al. v. Corvias Management – Army LLC, et al.*
Case No. 1:19-cv-03253-ELH

Dear Judge Coulson:

We write to inform Your Honor that upon further investigation, counsel for Defendants have recently learned that for a brief period in the Spring and Summer of 2019, in addition to the confidential consulting role performed for Holland & Knight and previously discussed with the Court, Aegis had some involvement in the distribution of schedules to remediation vendors. Some of the documents identified for *in camera* review by Plaintiffs, and others on the privilege logs of Black and Veatch and ServPro, involve such communications concerning the schedule. *See e.g. in camera* documents BVP-00012, BVP-00061, and SPP-00026.

We have informed counsel for Plaintiffs that we will de-designate such communications concerning the schedule that were previously designated as privileged and promptly produce same.

We wanted to inform Your Honor of this development and suggest that the Court's *in camera* review of such documents noted above is unnecessary at this time, as Plaintiffs can review the supplemental production and determine if there are any remaining issues concerning the de-designated documents that require further meet and confer.

We appreciate the Court's attention to these issues.

Date: September 10, 2021

Respectfully submitted,

HOLLAND & KNIGHT LLP

/s/

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